

From: [Iris Davis](#)
To: [SaltonSeaComments;](#)
CC: [Jurg Heuberger; Darrell Gardner; Ralph Cordova; Joanne Yeager; Larry Grogan; Jim Minnick; Rosa Soto; Carina Alcantar;](#)
Subject: Comments on DPEIR Salton Sea Ecosystem Restoration Program
Date: Tuesday, January 16, 2007 4:03:09 PM
Attachments: [Board Comments re_PDEIR Salton Sea Restoration.pdf](#)
[Planning Comments re_DPEIR Salton Sea Restoration.pdf](#)
[image001.jpg](#)

Attention:

Attached hereto please find comments on the DPEIR for the Salton Sea Ecosystem Restoration Program from the Imperial County Board of Supervisors and the Imperial County Planning & Development Services Department.

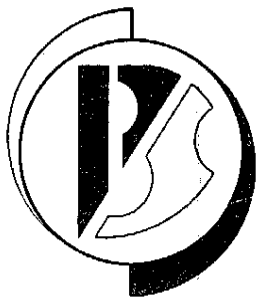
A copy will be faxed to (916) 653-9745, Attention: Dale Hoffman-Floerke. The originals will be arriving by Certified Mail shortly.

If you have any questions, please contact this office at (760) 482-4236 or the Clerk of the Board of Supervisors at (760) 482-4220.

Thank you,

Iris Davis

Imperial County
Planning & Development Services



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IMPERIAL COUNTY

PLANNING & DEVELOPMENT SERVICES

PLANNING / BUILDING INSPECTION / ECONOMIC DEVELOPMENT / PLANNING COMMISSION / A.L.U.C.

JURG HEUBERGER, AICP, CEP, CBO
PLANNING & DEVELOPMENT SERVICES DIRECTOR

CERTIFIED MAIL 7003-2260-0003-7209-6588

January 16, 2006

Dale Hoffman-Floerke, Chief
CA Department of Water Resources
Colorado River and Salton Sea Office
1416 9th Street, Room 1148-6
Sacramento, CA 95814

SUBJECT: Response to the "Draft Programmatic EIR for the Restoration of the Salton Sea Ecosystem/Resources"/SCH #2004021120

Dear Ms. Hoffman-Floerke:

The County of Imperial received the "Draft Programmatic Environmental Impact Report (DPEIR)" on **November 2, 2006**, for the restoration of the Salton Sea ecosystem and the preservation of its fish and wildlife resources pursuant to the Quantification Settlement Agreement (QSA) implementing legislation. The study period for the Programmatic EIR extends from 2003 to 2078 (75-year study period) for which the QSA could be in effect.

The following are the County staff's comments on the Draft Programmatic EIR that are also being sent to your e-mail address on this date:

- 1) In the Draft PEIR, Chapter 1, Introduction, Water Transfers, page 1-9, it states that "...Under the QSA and Fish and Game Code, a total of **up to 800,000** acre-feet conserved by IID will be conveyed into the Salton Sea until 2017 to mitigate a portion of the adverse impacts caused by the transfer of water from IID to SCWA (Fish and Game Code Section 2081.7(c)(2)). The Fish and Game Code also allows for the transfer of **a separate 800,000** acre-feet of conserved water from IID to DWR at **\$175/acre-foot** in 2003 dollars and adjusted for inflation (Fish and Game Code Section 2081.7(c)(1)...No (c)(1) or (c)(2) water may be transferred unless the Secretary for Resources determines that the transfer is consistent with the preferred alternative. DWR will be responsible for mitigating any environmental impacts related to the transfer of (c)(1) water and for environmental impacts due to changes in the Salton Sea salinity related to the transfer of (c)(2) water. DWR will be able to sell the (c)(1) water and any (c)(2) water to Metropolitan at a price of not less than **\$250/acre-foot** in 2003 dollars and adjusted for inflation. Monies from these sales, after deducting costs and reasonable administrative expenses, will be deposited into the Salton Sea Restoration Fund..."

Therefore, pursuant to the above statement, there is a total of 1,600,000 acre-feet of water that could be transferred by 2017 or soon thereafter? If so, what percentage of these funds will be for “mitigation”? The Final PEIR should specifically state whether all of the “monies” received from water transfers are to be used only for “restoration” or are they intended to be utilized for “mitigation” activities also.

- 2) The Salton Sea is located approximately three-fourths (3/4) of its total area within Imperial County. Representatives from the County of Imperial and the County of Riverside have been an integral part of the Salton Sea Authority (SSA) and its Task Force since 1986.

The County of Imperial's General Plan and its Elements have various policies and provisions that are germane to the restoration and preservation of the Salton Sea for recreation and wildlife habitat protection. The General Plan supports the restoration of the Salton Sea and within the Draft PEIR, Table 11-4, Summary of Benefit and Impact Assessments to Land Use, it states that **Alternative #7 Combined North and South Lake**, "...would support habitat and recreational uses in a similar manner as those described in the **General Plan**..." (emphasis added).

It is important that the work and studies on the Sea, that have been done by the Salton Sea Authority's scientific committee and Task Force members, be recognized by the State DWR and the State Fish & Game Department. The SSA's preference is the "Alternative #7, Combined North and South Lake". This alternative includes a beneficial use of Colorado River water as part of an "IID freshwater reservoir". This alternative would support the County's General Plan goal of preserving "...**the integrity, function, productivity, and long-term viability of environmentally sensitive habitats, and plant and animal species**..." (Conservation and Open Space Element, "Preservation of Biological Resources").

The Draft PEIR provisions for the State's selected "**preferred alternative**" would require a revision to certain elements of the General Plan, e.g. the Land Use Element, the Agricultural Element, the Conservation/Open Space Element, and the Water Element regarding the public's future use of agricultural irrigation and drainage water, impacts to aesthetics, air quality impacts, agricultural/farming impacts, growth-inducing impacts, wildlife habitat destruction/restoration, land use impacts, receding of the Salton Sea seabed/shoreline, future potential water transfers, and future socio-economic impacts to the County and adjacent communities surrounding the Salton Sea, to name a few.

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The Final PEIR and the State's selection of a "preferred alternative" should be consistent with the Imperial County General Plan, its goals and objectives in preserving the Salton Sea and its habitat as well as provide mitigation for assisting the County if the State's selection of an alternative subsequently requires revisions to the various "Elements" of the General Plan.

- 3) The "Alternative #3" in the draft PEIR has been proposed by the Imperial Group as submitted in the spring of 2006, i.e. the "Concentric Lakes", utilizing a "...dredge-filled Geotube ® covered with earthen materials to form a low barrier...The final side slopes would be constructed at 5:1. Rock-slope protection would be placed on the lake side of the Geotube ® Berm..."

The PEIR's Appendix I addresses the "Concentric Rings" proposal by the Imperial Group. Within this Appendix, the protection envisioned is again "rock-slope protection" on the lake side of the berm. This alternative would create a "...**Perimeter Dike** that would encircle the -204 feet msl contour and would provide desert pupfish connectivity along the entire shoreline..." The flow of the relatively fresh-water from the New River, Alamo River, Whitewater River, IID drains, Salt Creek, and San Felipe Creek would bring new pollutants to the "shoreline" of the Sea and create significant sources of contamination to areas of the "shoreline" where there currently is none.

Also, nowhere in the Draft PEIR, or Appendix I, is there any mention of or protection from a 100-year flood from any one or more of the above-mentioned water ways, and certainly does not address flooding from the numerous large washes that encircle the Salton Sea. Since the documents only mention "rock-slope protection" on the **lakeside** of the Berm, there is a significant risk, in the event of a 100-year storm event, that the proposed "Geotube ® Berm" would be destroyed by off-shore flash floods.

The Final PEIR should re-visit this proposed "2006" alternative by the Imperial Group and provide a comprehensive analysis of the impacts of a destroyed "Perimeter Berm" due one or more 100-year flood(s) and the cost implications thereof and how they could be re-built at what costs.

The Final PEIR should address what would be the impacts, e.g. contamination, stagnation, destroyed berm structures and the resulting mal odorous conditions from contaminants from the New and Alamo Rivers, and who would pay for any required re-construction of the "Perimeter Berm", e.g. if there are two 100-year storm events that occurred back-to-back, like the two Tropical Storms, Doreen and Kathleen, what then?

- 4) Imperial County General Plan is discussed in Chapter 4, Summary of Previous Studies and Related Projects, pages 4-14 and 4-15, and states "...The Imperial County General Plan directs the location and **to some extent**, the amount of land use changes in the county..." (emphasis added). The PEIR should be revised to state that the County of Imperial Board of Supervisors, through the approved General Plan, various Elements and Land Use Ordinance does in fact designate specific land uses, provides zoning on each parcel within the County, and implement all legal requirements within its jurisdiction to ensure the public's health and safety.

The County of Imperial does not delegate or abrogate any of its jurisdiction and/or land use authority to any Federal or State agency, unless it is found that the land use issue has been entirely pre-empted by either Federal or State law as settled within the appropriate court of law.

In the Land Use section, Federal Land Use Planning Efforts, it states that "...5,840 acres of the Test Base were transferred to the BLM in 2000..."

The Draft PEIR does not indicate that the Salton Sea Authority seeks to promote the future development of the Navy's Test Base lands for residential and commercial development. Also, the communities of Vista Del Mar and Salton City have seen a tremendous increase recently in the number of housing and commercial applications for development in these areas. Also, the Torres-Martinez Cahuilla Indian Tribe has also proposed plans for their lands between Salton City and Salton Sea Beach, including the construction of a Casino.

Also, within the Land Use, West Shores/Salton City section, it states that there is a "...The proposed Habitat 2000 development includes 1,720 acres of land between Salton Sea Beach and Vista Del Mar (County of Imperial, 2000)...The specific schedule for development was not finalized during preparation of this PEIR..." The Habitat 2000 development as of this date is not a viable project and there are no plans at this time for the development of this project.

The Final PEIR should revise the above text to clarify the County's jurisdiction and involvement with the "...amount of land use changes in the county..." as discussed above and also indicate what the future plans are for development within the above communities.

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- 5) There are eight (8) proposed "Alternatives" that have been proposed as part of the PEIR's restoration project. The selected or "preferred alternative" by the State should reflect the State's Fish and Game Code, Section 2931, requirements as they are listed below within Chapter 1, page 1-9:

- **Restoration of long term stable aquatic and shoreline habitat for the historic levels and diversity of fish and wildlife that depend on the Salton sea;**
- **Elimination of air quality impacts from the restoration projects; and**
- **Protection of water quality.**

In Chapter 10, Climate and Air Quality, page 10-31, it states "...all alternatives are predicted to result in changes in water quality, and may result in odorous emissions, such as hydrogen sulfide and ammonia. Water bodies in all alternatives would remain eutrophic. Alternatives with deeper water bodies in the northern part of the basin would become thermally stratified and produce significant amounts of anoxic water. Mixing of those waters to the surface would occur and result in localized fish and invertebrate die-offs..." (emphasis added). This section also indicates that there is a potential for microclimatic changes for those areas adjacent to the Salton Sea.

The Final PEIR should state that after the year 2017, the California State Department of Water Resources (DWR) could face a significant burden in the continuation of the Sea's wildlife habitat and restoration efforts, including the handling of the above-mentioned "odorous emissions".

- 6) With the restoration of the Salton Sea and its ecosystem, there is a very great potential for residential, commercial, industrial, and Torres-Martinez Indian Tribal growth to occur in and around the various townsites that surround the Salton Sea. For example, there may be substantial population growth in the areas such as the Niland/Calipatria area, Westmorland area, and particularly within the West Shores communities of Salton City, Vista Del Mar, Salton Sea Beach and Desert Shores.

If the Salton Sea habitat and restoration activities were to occur with beneficial results, then the existing communities would appear to have a chance of flourishing as was the case during the 1950's and 1960's.

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However, the State's selected ecosystem restoration "**alternative**" could severely curtail and stifle future growth if the preferred alternative results in generation of air quality deterioration and dust storms created by the approximately 77,000 acres (120 square miles of previously inundated Sea sediments), mal odorous conditions due to stagnation of ponds, mosquito infestation due to lack of circulation, increased fish die-offs due to contamination/pollution, increased salinity that could result in deaths of rare and endangered species, e.g. white and brown pelican, Yuma/Black Clapper Rails, and Desert Pupfish, as well as future water transfers to entities outside Imperial County.

Since the Draft PEIR, states that "...DWR will be responsible for mitigating any environmental impacts relating to the transfer..." (emphasis added) what if the funds in the Salton Sea Restoration Fund is not sufficient to alleviate and mitigate the above-mentioned future problems?

Further, what happens if and when the above-mentioned **1,600,000 acre-feet** is transferred to SDCWA and/or Metropolitan Water District? The Final PEIR should address in a "worst-case scenario" where any additional funding will come from to adequately mitigate and address the above concerns as of the year "**2017**" (and/or there are future water transfers).

No responsible agency, special district, County entity, County taxpayers, and adjacent Sea residents should be left with any financial burden caused by the selection of the "preferred alternative" by the State DWR and the State Fish and Game ecosystem restoration proposal.

- 7) The PEIR, Chapter 16, Paleontological Resources, Regulatory Requirements, page 16-1, states that the Imperial County General Plan does not specifically address paleontological resources. However on a case-by-case basis, each development project is in fact reviewed environmentally for any site-specific impacts that the project has on cultural, paleontological and pre-historic resources. As part of the permitting process, a study is typically required for on-site reviews to review/address both the on-site and off-site potential for such resources and a condition imposed on the Permittee, e.g. "...If a discovery is made of any uncovered or unearthed artifacts or human remains, the cataloging of these resources, re-location, preservation and monitoring of such resources is required. All construction and on-site activities must cease until a qualified archaeologist/paleontological expert has been approved by both the County and the appropriate Indian Tribe, has inspected the site and determined the importance of the find, vulnerability of the discovery and a plan for re-location and/or preservation in place has been documented. Once this has occurred, construction activities can then resume..."

The Final PEIR should be re-visited and describe how the County of Imperial, Tribal entities and archaeology/paleontological experts study, review, handle, document, and monitor resources discovered.

- 8) The Draft PEIR, Chapter 4, page 4-17, discusses the CalEnergy Salton Sea Unit 6, CE Obsidian Energy LLC, as a planned "...185 megawatt geothermal power plant..." Subsequent to the preparation of the Draft PEIR, CalEnergy modified the power plant and increased the size of the plant to be a "215 megawatt" plant. The Final PEIR should make the above "errata" change.

Also, the DPEIR discusses desalinization plants using vertical tube evaporation (VTE) technology to desalt Sea water near the Sea's south end. Desalinization could produce replacement water for the Sea or for sale to urban areas. The County has been contacted by CalEnergy that, adjacent to its Salton Sea Unit I facilities, this type of desalinization methodology is being reviewed for possible use in providing replacement water to the Sea.

Again, be advised that in the event that any future VTE technology is proposed to be utilized by CalEnergy within its Unit I power plant facility process, the existing Conditional Use Permit would need to be amended to permit this type of desalinization operation and the output flowing into the Salton Sea.

- 9) The County's Conservation/Open Space Element, page 45, **Preservation of Water Resources**, "...Goal 8: The County will conserve, protect and enhance the water resources in the planning area..." and also states in Objective 8.2 "...Maintain the salinity of the Salton Sea at 40,000 parts per million salinity and encourage the advantageous usage of the Salton Sea for agriculture and natural drainage, recreation, and development..." The currently County General Plan seeks to keep the Salton Sea a "marine" body of water.

The Final Programmatic EIR and State selection process will address how the above County goal and objective is to be accomplished. As previously discussed, the Salton Sea Authority's "**Alternative #7**" appears to be the most compatible with the County's goals and objectives.

Appendix H-2, page H2-12, Salt Loads, discusses the total salt loads for the New and Alamo rivers, IID direct drains, and groundwater has been estimated by the IID for 1950 to 1999 (IID, 2002), "...Average salt load from the Imperial Valley for the historical period is estimated at 3,555,000 tons/year..."

Since the "**historical**" flows of the New River and the Whitewater drainage system has been recently reduced by the new treatment plant in Mexico for the power plants and the Torres-Martinez Indian Tribe's use of "wetlands" on the Whitewater drainage system, the above figures using 1999 and 2003 information should be re-visited in the Final PEIR.

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If the County's General Plan goals and objectives are not met, then the Final PEIR should reconcile the preferred "alternative" chosen and its compliance or non-compliance with the above Imperial County General Plan requirements.

- 10) The Draft PEIR, Appendix H-6, page H6-71, discusses the transportation of rocks for construction from the Eagle Mountain Mine. It states that "...If the Eagle Mountain Mine was used, the existing railroad would need to be repaired and an additional track or siding could be constructed to meet production rates..." The existing railroad track adjacent to State Highway 111 to the Eagle Mountain Mine is not in service at this time and to "repair" or add an "additional track or siding" would add a tremendous expense to the already expensive alternatives that are being considered for the restoration project.

The time for the construction of the barrier as discussed in Appendix H-6, Special Construction Methods, page H6-70, is estimated to take 4 years (24 hours/day for 7 days/week for 4 years) with another estimate in this Appendix indicating that it could take "over 7 years", unless air quality management did not allow for higher levels of construction activities, then it may take even longer.

In Appendix I, Alternative-Specific Materials Provided by the Imperial Group and the Salton Sea Authority, it states on page 23, that for construction of barriers, perimeter dikes, berms, and conveyance facilities, the document states "...The construction of the Plan would be completed in 8 to 12 years..."

Why the significant difference in these estimates for construction purposes, e.g. four years, seven years, and 8 to 12 years? The proposed use of rock from Eagle Mountain, by improving the existing Union Pacific Railroad tracks and additional track or siding, may not be a viable alternative due to the length of time to implement these improvements and the significant expense that would be incurred for such a proposal.

Also, the Union Pacific Railroad is mentioned in the maintenance and operations of the two treatment plants, e.g. sludge removal or chemical deliveries, and the document states that "...A rail spur is proposed to deliver chemicals to the Alamo River treatment plant..." Has the Union Pacific Railroad been contacted and has an estimated cost for the above proposals been provided and, if so, what estimates for time and funds has the Union Pacific proposed for each of these proposals for the required "rock" and "rail spur" to the Alamo River treatment plant?

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The Draft PEIR discusses the potential use of the Torres-Martinez "Coolidge Mountain" for rockfill materials that is located adjacent to the northwesterly shoreline of the Sea. The Salton Sea Authority is investigating the permitting issues and if future impact to private lands occurs this may require review and County permitting.

The Final PEIR should address whether obtaining the necessary "rock" from the Eagle Mountain Mine and the "rail spur" to the Alamo River treatment plant are a viable, timely and a reasonable cost to incur from the Union Pacific Railroad for the proposed Salton Sea restoration project.

- 11) In Chapter 7, page 7-2, it indicates that the San Andreas and Algodones faults do not appear to impede or control groundwater movement, based on ground water levels from the 1960's. (Salton Sea Authority, 1999). However, thereafter on page 7-6, it states "...The East Salton Sea Basin is bordered on the north and east by the Chocolate Mountains and by the San Andreas Fault and the Salton Sea on the west. Groundwater movement is primarily in a western to southwestern direction towards the Salton Sea. Groundwater flow may be impeded by the faults (DWR, 2003)..."

There was a geological study by UCSD staff who trenched for a geo-technical study on earthquake faulting at Salt Creek, adjacent to the Salton Sea and east of State Highway 111. The Final PEIR should obtain the results of the UCSD study and include any applicable information within the final environmental document as appropriate relating to the flow of groundwater.

- 12) In Chapter 9, pages 9-22 through 9-28, it indicates that "Alternative 1" would have a loss of mineral resources (e.g. rock and gravel) impacting 136,700 acres of land; "Alternative 2" would lose about 206,400 acres; "Alternative 3" about 155,450 acres; "Alternative 4" about 96,950 acres; "Alternative 5" about 230,450 acres, "Alternative 6" about 224,250 acres of land; "Alternative 7" about 131,950 acres; and "Alternative 8" about 209,550 acres of land.

The Final PEIR should address specifically where the "mineral resources" are to be obtained from and whether or not any of these rock and gravel resources are within areas designated as "Agriculture" in the County's Land Use Element/Land Use Plan Map, Zoning Maps, for any potential impacts on agricultural resources or the creation of land use conflicts.

- 13) Within Appendix I, page 24, it states that "...asphalt-paved roads will be constructed to the quarry site and to the marina sites. It is anticipated that these will be standard road widths and would be relatively short roads coming off either Highway 86 or 111. Unsurfaced maintenance roadways would be on top of the larger embankments..." Will these asphalt-paved roads then become "County-maintained" roads? Has the Imperial County Department of Public Works been contacted to determine if the "widths" of the proposed "asphalt-paved roads" are consistent with minimum County standard road "widths"?

The Final PEIR should indicate whether or not the proposed asphalt-paved roads will become a County burden for future maintenance and if these roads are intended to become listed on the County-maintained mileage logs?

- 14) The Draft PEIR, Chapter 19, page 19-14, Public Services and Utilities, Next Steps, discusses the impacts that the "alternatives" would have on local solid waste landfills. The document acknowledges the detrimental effects to the future and life spans of these landfill facilities by drastically reducing their capacity. The mitigations proposed discuss only the encouragement of recycling and transportation of the waste generated to other counties which have larger capacities for solid and hazardous waste disposal.

Also in Appendix I, 5. Water Quality Management, page 5, it discusses the "...chemical treatment followed by solids separation (CTSS) system..." and later discusses "...sludge quality and volumes..." and further states "...The residuals from the CTSS plant and filtrate from the hyplimnetic water treatment plan will be store in holding ponds and then conveyed to the brine pool. **No residuals/filtrate will be hauled off-site...**" (emphasis added). In the event that the chemical treatment plants, their holding ponds and the resultant sludge is characterized as a "toxic" or a "hazardous waste", then it should be disposed of in an appropriate manner that meets all federal and state toxic requirements that may include disposal in the County's hazardous waste disposal site.

As you may be aware, Imperial County has the only hazardous waste site located in Southern California. The Clean Harbors hazardous waste landfill is located approximately six miles west of the City of Westmorland. The transportation of any hazardous waste generated by the Salton Sea restoration project to any other "county" would add a very expensive transportation cost to the project.

The Final PEIR should propose that any disposal of hazardous waste generated by the project be disposed of within the local Clean Harbors hazardous waste landfill. The County should be kept fully advised of any and all "byproduct disposal" whether or it is solid waste or hazardous wastes and any trucking and disposal thereof into the Clean Harbors hazardous waste facility may require an amendment to its existing County permit.

- 15) The State Department of Fish and Game through the preparation of the Programmatic EIR is mandated by state law to create and preserve the existing and future ecosystem and biological resources found in and adjacent to the Salton Sea. As all may be aware, in the recent past the Salton Sea was been categorized by various individuals and agencies as the best fishing grounds in the State of California. The Final Programmatic EIR and the State's selected "preferred alternative" must keep "fishing" as one of the recreational uses of the Salton Sea and any significant impacts to the water quality of the Sea and future impacts on the fishery should be fully protected.

Historic recreational and biological values of the Salton Sea, e.g. enjoyment of fishing, boating, habitat preservation/creation, swimming/wading, sight-seeing, bird watching, or other water-related recreational activities, the Final PEIR must ensure that the "preferred alternative" selected by the decision-making agencies do the greatest good for the future preservation and protection of the State largest body of water for the above-mentioned purposes.

- 16) The use of "Wetlands" is identified as a method of reducing nutrients into the Salton Sea on the New and Alamo rivers. In Appendix I, it states that a full build out of these "wetlands", "...4,000 acres of wetlands are planned..." But in a following section, it states "...Wetlands, specifically along the New and Alamo Rivers, are part of the plans for reducing inflow loads to the Salton Sea. The proposed locations of the wetlands have been identified in past work performed for the Citizens Congressional Task Force (Nolte, 2002). This report identified 35 sites totaling 4,300 acres that were suitable for development wetlands..." The Final PEIR should correct which "wetlands" figure is the correct one.

Since these wetlands locations are planned to be "...constructed in mid to late 2007, with all proposed wetlands being built over a period of ten years...", the County staff should be immediately contacted to ensure that these planned wetlands are reviewed for their land use impacts and any environmental documentation that may need to be approved.

The "wetlands" proposed include sediment basins that would need "periodic cleanout. Also, the treatment plant for the river flows would include a pretreatment settling pond which would need to be maintained. In addition, some periodic maintenance dredging in the south basin may be needed..."

In the future, when the sediment is analyzed and determined to have toxic or heavy metal constituents that exceed the federal and state standard criteria and considered a "hazardous waste", then a waste disposal plan will need to be prepared for appropriate disposal, i.e. including the Clean Harbors hazardous waste site.

The Draft PEIR discusses in the various "alternatives" submitted for review, e.g. lakes, brine sink, wetlands, and reservoirs, which when constructed and maintained could become a new breeding ground for mosquitos that can carry various viruses.

The typical condition for projects within Imperial County is to prepare and obtain a County-approved "Mosquito Abatement Plan and Program" in order to reduce the risk of any mosquito-borne virus from significantly impacting local residents, snow-birds, and/or other visitors to the Salton Sea and its environs.

The Final PEIR should address how mosquitos will be abated for the selected "preferred alternative" and what mitigation measures and monitoring proposed that will mitigate the risk of encephalitis or West Nile virus being transmitted to residents and visitors. As you may be aware, the West Nile virus has been found in poultry within the Niland area already.

There are a number of "typos" in the Draft PEIR as follows: Chapter 3, Description of Alternatives, page 3-80, it states that "...conserved water from IID to DWR at **\$175/acre-foot** in 2003 dollars..." which is a different figure from the "**250/acre-foot** in 2003 dollars on page 1-9; Chapter 21, page 21-5 "...SDG&E is participating in development of a 300 Megawatt solar farm near Calexico..." which should read "near Ocotillo"; Chapter 21, page 21-6, "...There are seven known geothermal resources areas (KGRAs) in Imperial County..." should read "There are nine"; ;Chapter 23, page 23-5, Drop 2 Reservoir Project, Lower Colorado Water Storage Project, indicates that the project would be located on "...about **621** acres formerly used for the Brock Ranch..." and the Final PEIR should read "about **615** acres"; Chapter 28, page 28-5, Bibliography, "Planning/Building Department" should read "**Planning and Development Services Department.**"

The County hereby reserves the right to provide further comments on the Final Programmatic Environmental Impact Report when it is received for review.

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We look forward to working with the various affected agencies and the decision-making bodies of all federal agencies, state agencies, special districts, water districts, Indian Tribes, military bases, area community residents and the Salton Sea Authority for restoring and maintaining the Salton Sea and its historic flora and fauna ecosystem.

If you have any questions on the above, please contact me at (760) 482-4236, extension 4279, or by e-mail at darrellgardner@imperialcounty.net.

Sincerely,



Darrell Gardner
Assistant Planning & Development Services Director

cc: Robertta Burns, County Executive Officer
Ralph Cordova, County Counsel
Joanne L. Yeager, Assistant County Counsel
Jurg Heuberger, AICP, CEP, Planning & Dev. Services Director
William Brunet, Imperial County Public Works Director
Stephen L. Birdsall, Agricultural Commissioner/APCO
Mark Johnston, Imperial County EHS/Health Department
Fred Nippins, County Fire/Office of Emergency Services
Michael King, Water, Imperial Irrigation District
Robert Perdue, Executive Officer, RWQCB, Region 7
Rick Daniels, Executive Director, Salton Sea Authority
Daniel N. Schochet, Vice-President, ORMAT Nevada
Vicki Woods, Field Manager, BLM/EI Centro Resource Office
Vincent Signorotti, Vice-President, Land Manager/CalEnergy
U.S. Fish & Wildlife Services, Calipatria office
CA State Dept. of Water Resources File
CA State Dept. of Fish and Game File
SS Ecosystem Restoration Draft PEIR File
File 10.100, 10.105, 10.124, 10.130, 10.133, 10.134, 10.142, 10.150, 10.331, 40.110